

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	CRIMINAL NO. 18-cr-30121-NJR
	)	
KELLY SEEGER,	)	<b><u>FILED UNDER SEAL</u></b>
	)	
Defendant.	)	

**UNITED STATES OF AMERICA'S  
EX PARTE MOTION TO REVOKE BOND**

The United States of America, by Steven D. Weinhoeft, United States Attorney for the Southern District of Illinois, and Ranley R. Killian, Assistant United States Attorney, moves for an order revoking Defendant's bond and remanding her to the custody of the United States Marshal pending a detention hearing in this case, and in support thereof states as follows:

1. On July 18, 2018, Defendant, Kelly Seeger, was charged with Passing Counterfeit Obligations of the United States, Title 18, United States Code, Section 371.
2. On August 27, 2018, the defendant was released on bond, with pretrial supervision ordered from the original indictment of the defendant.
3. Since release on bond, United States Probation reports that the defendant has had several issues complying with this Court's bond conditions. The most serious of which requires the Government to seek revocation of that bond. On September 4, 2018, the Mt. Vernon, Illinois Police Department arrested Seeger for retail theft. During the arrest, Seeger used the false name of Crystal Bishop. (See Violation report of United States Probation for details on how Seeger was identified).

4. Due to the increased risks of nonappearance and danger to the community posed by the defendant's violation conduct, and risk of nonappearance, it is respectfully recommended that a bond violator's warrant be issued and the defendant's bond be revoked.

WHEREFORE, based on the above, the United States of America moves for the issuance of an arrest warrant and for the temporary detention of the Defendant to permit revocation of the Defendant's conditional release, pursuant to Title 18, United States Code, Section 3148(b).

Respectfully submitted,

STEPHEN D. WEINHOFET  
United States Attorney

*s/ Ranley R. Killian*

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**Certificate of Service**

I hereby certify that on September 5, 2018, I caused to be electronically filed UNITED STATES OF AMERICA'S EX PARTE MOTION TO REVOKE BOND with the Clerk of Court using the CM/ECF system which will send notification of such filing(s) to all parties of record.

Respectfully submitted,

STEPHEN D. WEINHOEFT  
United States Attorney

s/ *Ranley R. Killian*  
\_\_\_\_\_  
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